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May 4, 2007

Via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036  
Amended 2006 30 Day Post-General Report (10/19/06 - 11/27/06), received 2/16/07

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated April 4, 2007, regarding the 2006 Amended 30 Day Post-General Report filed by SEIU COPE on 2/16/07. In that letter you raise six (6) questions regarding certain expenditures reported by SEIU COPE on Schedules B and E of its Report and on the 24 and 48 hour notices that SEIU COPE filed with the Commission disclosing certain independent expenditures. I will respond to your questions in the order they were asked.

Question 1.

The 10/31/2006 independent expenditure of \$1,265.40 paid to the SEIU Communications Center Inc. for phone bank services on behalf of congressional candidate Phil Hare which began on 10/12/2006.-- The amount of this expenditure is below the reporting threshold for 48 hour notices. SEIU COPE will amend its Pre-General Report to reflect the debt to SEIU Communications Center Inc. for these phone bank services and its Post-General Report to reflect the payment of this debt.

The 11/3/2006 independent expenditure of \$701.90 paid to the Pennsylvania State Council for canvass material on behalf of congressional candidate Joseph Sestak -- This independent expenditure was included within the expenditures reported on SEIU COPE s 11/4/2006 24 hour notice but may have been confusing because 3 actual expenditure items in the Report equate to the 2 items included on the 24 hour notice. SEIU COPE will amend the Post-General Report to include a note to clarify this.

Question 2.

SEIU Local 4 -- The independent expenditure in the amount of \$3,045 dated 11/3/06 reported as payable to SEIU Local 4 for canvass workers supporting congressional candidate Jason Altmire, on a 24 hour notice filed on 11/4/2006, incorrectly identified the vendor. The canvass workers were provided by the Pennsylvania State Council, SEIU and the payment for these services was included in the 11/27/06 payment to the Pennsylvania State Council which was reported on SEIU COPE s Post-General Report.

Pennsylvania State Council, SEIU -- The independent expenditure in the amount of \$640 paid to the Pennsylvania State Council for literature supporting congressional candidate Jason Altmire, reported on the 11/4/2006 24 hour notice, was part of the 11/27/2006 payment to the Pennsylvania State Council reported on SEIU COPE s Post-General Report.

SEIU (General Fund) -- Payments to the SEIU (General Fund) for the independent expenditures disclosed in the 11/4/2006 24 hour notices are reflected in Schedule E of the SEIU COPE Amended 30 Day Post-General Report as having been made on 11/4/2006.

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